

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and
IME MANAGEMENT & CONSULTING LLC,

Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**DECLARATION OF DANIELLA LEVI,
ESQ. IN OPPOSITION TO WARNER &
SCHEUERMAN'S MOTION TO
WITHDRAW AS COUNSEL**

Daniella Levi, Esq. declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that the following is true and correct:

1. I am the sole shareholder and Chief Operating Officer (“COO”) of IME WatchDog, Inc. (hereinafter “Plaintiff” or “IME WatchDog”), the Plaintiff in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge.

3. I respectfully submit this declaration in opposition to Warner & Scheuerman’s motion to withdraw as counsel to Defendants.

4. On April 2, 2025, I appeared for a virtual hearing before this Court.

5. During the hearing, Safa Gelardi (“Safa”) and Vito Gelardi (“Vito”) made outlandish statements, without any basis in fact, accusing me of continuing this litigation because I am Israeli and Safa is Palestinian.

6. This statement is entirely untrue.

7. As this Court may recall, there was a moratorium in this litigation where the parties explored settlement; I made a very reasonable demand which the Defendants chose to reject.

8. In any event, this case is not continuing based on Safa's and/or Vito's nationality.

9. It continues due to the Defendants' demonstrated disregard of Court Orders and violations of the Defend Trade Secrets Act, which Plaintiff has repeatedly proven to this Court.

10. The unfounded accusation at the April 2, 2025 virtual hearing was followed by a disgusting unsolicited text message sent to me on April 16, 2025 by Safa's husband, Vito, stating "I took whatever money I had and I gambled it all to try to double it, there's no proof, stick that up your ass."

11. A true and correct copy of the text message that I received from Vito is annexed hereto as **Exhibit "A"**.

12. Pursuant to the October 20, 2023 Second Amended Preliminary Injunction, Vito is prohibited from contacting me. See ECF Docket Entry [254-1](#) at ¶ A(3) ("Defendants, their agents, officers, and employees, and all other persons and entities in active concert or participation with them, are preliminarily enjoined from ... contacting (or eliciting contact from) and/or surveilling Plaintiff's current clients, employees, and agents ...").

13. I feel threatened by Vito and Safa's total disregard of the Second Amended Preliminary Injunction and the nature of his communication to me.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 22, 2025


Daniella Levi (Apr 22, 2025 14:22 EDT)

Daniella Levi, Esq.